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OFFICE OF THE
EXECUTIVE SECRETARY

March 1, 2002

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *Docket No. 97-00409: All Telephone Companies Tariff Filings
Regarding Reclassification of Pay Telephone Service.
Response to PreHearing Officer's February 26, 2002 Order*

Dear Mr. Waddell:

United Telephone-Southeast, Inc. ("United") hereby files its response to the Pre-Hearing Officer's Order on February 26, 2002 Status Conference ("Order"). Pursuant to the Order, Mr. Dan Gordon, subject matter expert for United, contacted Mr. Don Wood, subject matter expert for the Tennessee Payphone Owners Association ("TPOA"). These two experts agreed that the following information would constitute a complete response by United to totally fulfill all of the remaining discovery issues of the TPOA:

By April 1, 2002, United will prepare a new cost study that will generate the data that was provided in United's response to Questions 2 and 3 of the TPOA's Fourth set of discovery, except that column 2 (e) of the response under the heading "Total Coin Lines served in Grid" shall separately identify "smart" pay phone lines from "dumb" pay phone lines.

United would note that the necessary data is not currently loaded into the program. Contrary to the assertion of the TPOA's attorney that providing data regarding smart phones is "...an easily done calculation..." (Transcript of February 26 status conference, page 9, line 22), in fact in order to develop the above response, billing data information must be reviewed and manually entered into the software program in order to identify smart from dumb payphone lines. This activity creates a substantial time requirement.

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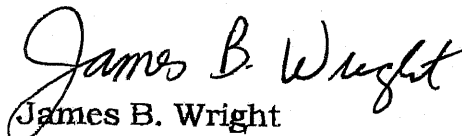
United would further note that it continues to believe this new database that United must create is irrelevant to this case, for the reasons stated at the status conference. Also, United was directed to comply with the BellSouth methodology and creating this response is contrary to that direction since the attorney for the TPOA admitted that "...its true that in the BellSouth case we did not separate the loop lengths [between smart and dumb phones]. We used an average loop length for all of it..." (Transcript of February 26, status conference, page 11, lines 21-24). However, in order to expedite resolution of this case, United will provide the above data, reserving its right to raise the above objections later.

As a further response to the Order, the following procedural schedule is proposed:

- April 01 United provides final response to TPOA discovery (see above).
- April 08 TPOA provides the payphone rate it supports.
- April 08 TPOA responds to United's pending discovery requests.
- April 10-17 United files additional discovery, if needed; TPOA provides responses within 10 days of receipt.
- One week after TPOA provides complete responses to United's discovery, both parties prefile Direct testimony.
- One week after Direct filed, both parties prefile Rebuttal testimony.
- One week after Rebuttal filed, possible hearing [Since United has not seen or been advised of the TPOA position at this point in time, United is unable to determine whether or not an evidentiary hearing is needed. If needed, United would propose a hearing one week after rebuttal is filed.]

The parties will advise if currently ongoing negotiations result in a settlement. Mr. Henry Walker, counsel for the TPOA, has authorized me to advise the TRA that he concurs in this letter. Please contact me if you have any questions.

Sincerely,


James B. Wright

cc: Parties of Record

CERTIFICATE OF SERVICE; DOCKET 97-00409
(Tariffs regarding Reclassification of Pay Telephone Service)

The undersigned hereby certifies that a copy of the foregoing letter was served upon the following parties of record by fax or by depositing a copy thereof in the U.S mail addressed as follows:

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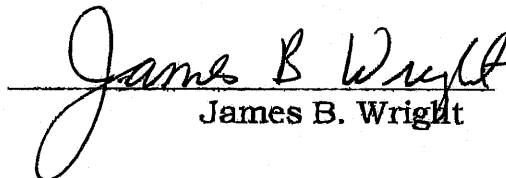
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